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*Attorneys for Defendants  
Transamerica Life Insurance Company,  
Transamerica Investment Management, LLC  
and Transamerica Asset Management, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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JACLYN SANTOMENNO, KAREN  
POLEY, and BARBARA POLEY, et  
al.,

Plaintiffs,

v.

TRANSAMERICA LIFE  
INSURANCE COMPANY,  
TRANSAMERICA INVESTMENT  
MANAGEMENT, LLC, and  
TRANSAMERICA ASSET  
MANAGEMENT, INC.,

Defendants.

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Civil Action No. 11-736 (FSH) (PS)

**TRANSAMERICA LIFE  
INSURANCE COMPANY'S  
NOTICE OF MOTION TO  
DISMISS CLASS ACTION  
COMPLAINT**

TO: Robert L. Lakind  
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*Attorneys for Plaintiffs*

COUNSEL:

PLEASE TAKE NOTICE that on Monday, June 20, 2011, at 9:30 a.m. or as soon thereafter as counsel may be heard, Defendant Transamerica Life Insurance Company ("TLIC"), located at 1150 South Olive Street, Los Angeles, California 90015, by and through its undersigned counsel, will move before the Honorable Faith S. Hochberg, U.S.D.J., for entry of an order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing the Class Action Complaint in this case with prejudice.

PLEASE TAKE FURTHER NOTICE that in support of this motion, TLIC will rely upon the Memorandum and supporting Declaration of Darcy Hatton submitted herewith. A proposed form of Order is also submitted. TLIC requests oral argument of this motion.

Dated: May 16, 2011

s/ Thomas R. Curtin

Thomas R. Curtin

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